COFFEYVILLE
RESOURCES™
REFINING & MARKETING
A CVR Energy, Inc. Company

January 13, 2017

CERTIFIED MAIL: Receipt No: 7010 1870 0003 0345 8809
RETURN RECEIPT REQUESTED

KDHE, Bureau of Air and Radiation
Attn: Mr. Javier Ahumada
1000 SW Jackson, Suite 310
Topeka, KS 66612-1366

RE: Coffeyville Resources Refining & Marketing, LLC ("CRRM")
Quarterly Report §61.357(d)(6), (d)(7), (f) and (g)
Benzene Waste Operations NESHAP (BWON) 40 CFR Part 61, Subpart FF

Dear Mr. Ahumada:

In accordance with 40 C.F.R. §61.357(d)(6), (d)(7), (f) and (g), enclosed is the quarterly report for CRRM's facility located in Coffeyville, Kansas. See Attachment 1.

I certify under penalty of law that this information was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my directions and my inquiry of the person(s) who manage the system, or the person(s) directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Should you have any questions or require additional information please don't hesitate to contact myself or John Ditmore by email at jdditmore@cvrenergy.com or by phone at (620) 252-4599.

Sincerely,

Darin L. Rains
Vice President & Refinery General Manager
Coffeyville Resources Refining & Marketing, LLC

Attachment 1
Benzene Waste Operations NESHAP
Quarterly Report

40 CFR 61 Subpart FF Quarterly Reporting Requirements

CRRM is subject to reporting requirements in §61.357 because it is a petroleum refinery that complies with §61.342(e), in accordance with the Second Consent Decree among CRRM, EPA and KDHE. This report fulfills the quarterly reporting requirements contained in 40 CFR 61, Subpart FF §61.357(d)(6), (d)(7), (f) and (g), for CRRM for the period covering July 1, 2016 to September 30, 2016. This report's format tracks each reporting requirement, with CRRM's response provided below. In cases where the reporting requirements do not apply to the refinery, CRRM made note of its inapplicability.

SECTION 1.0 40 CFR 61, SUBPART FF REPORTING REQUIREMENTS

§61.357(d)(6): Certification that Required Inspections Have Occurred

CRRM has carried out the required inspections in accordance with the requirements of this subpart.

§61.357(d)(7): Treatment Process and Control Device Specific Reporting Requirements:

The reporting requirements for waste management unit control devices are addressed below for each subsection of §61.357(d)(7).

§61.357(d)(7)(i) - … if monitoring in accordance with §61.354(a)(1), each period of operation during which the concentration of benzene in the monitored waste stream exiting the [treatment process] unit is equal to or greater than 10 ppmw.

NOT APPLICABLE: CRRM monitors in accordance with §61.357(d)(7)(ii).

§61.357(d)(7)(ii) - … if monitoring in accordance with §61.354(a)(2), each 3-hour period of operation during which the average value of the monitored parameter is outside the range of acceptable values or during which the unit is not operating as designed.

See Attachment 2. The operating parameter of the benzene stripper at CRRM is continuously monitored and recorded on a minute basis using a flow indicator and inspected at least once each operating day in accordance with §61.354(a)(2). Except as identified in Attachment 2, there were no other 3-hour periods of operation during which the average value of the monitored parameter was outside the range of acceptable values or during which the unit was not operating as designed.

§61.357(d)(7)(iii) - … if complying with the requirements of §61.354(b), each period of operation during which the flow-weighted annual average concentration of benzene in the monitored waste stream entering the unit is equal to or greater than 10 ppmw and/or the total annual benzene quantity s equal to or greater than 1.0 Mg/yr.

NOT APPLICABLE. CRRM does not use an enhanced biodegradation unit (EBU) to control waste management units containing benzene waste.

§61.357(d)(7)(iv) - … if complying with the requirements of §61.354(c), each period of operation monitored during which any of the following conditions occur, as applicable to the control device:

Thermal Vapor Incinerators - §61.357(d)(7)(iv)(A) – Each 3-hour period of operation during which the average temperature of the gas stream in the combustion zone of a thermal vapor incinerator, as measured by the temperature monitoring device, is more than 28°C (50°F) below the design combustion zone temperature.

NOT APPLICABLE. CRRM does not use a thermal vapor incinerator to control BWON-affected waste management units.

Catalytic Vapor Incinerators - §61.357(d)(7)(iv)(B) – Each 3-hour period of operation during which the average temperature of the gas stream immediately before the catalyst bed of a catalytic vapor incinerator, as measured by the temperature monitoring device, is more than 28°C (50°F) below the design gas stream temperature, and any 3-hour period during which the average temperature difference across the catalyst bed (i.e., the difference between the temperatures of the gas stream immediately before and after the catalyst bed), as measured by the temperature monitoring device, is less than 80 percent of the design temperature difference.

NOT APPLICABLE. CRRM does not use a catalytic vapor incinerator to control BWON-affected waste management units.

Boilers and Process Heaters - §61.357(d)(7)(iv)(C) – Each 3-hour period of operation during which the average temperature of the gas stream in the combustion zone of a boiler or process heater having a design heat input capacity less than 44 MW (150 x 106 BTU/hr), as measured by the temperature monitoring device, is more than 28°C (50°F) below the design combustion zone temperature.

NOT APPLICABLE. CRRM does not use any boilers or process heaters to control BWON-affected waste management units.

Carbon Adsorber, Condenser, or Other Vapor Recovery System - §61.357(d)(7)(iv)(D) – Each 3-hour period of operation during which the average concentration of organics or the average concentrations of benzene in the exhaust gasses from a carbon adsorber, condenser, or other vapor recovery system is more than 20 percent greater than the design concentration level of organics or benzene in the exhaust gas.

NOT APPLICABLE. CRRM does not operate a control device with a continuous recorder to determine the concentration of benzene in the exhaust gasses from BWON-affected waste management units.

Condenser Exhaust Vent Stream - §61.357(d)(7)(iv)(E) – Each 3-hour period of operation during which the temperature of the condenser exhaust vent stream is more than 6°C (11°F) above the design average exhaust vent stream temperature, or the temperature of the coolant fluid exiting the condenser is more than 6°C (11°F) above the design average coolant fluid temperature at the condenser outlet.

NOT APPLICABLE. CRRM does not use vapor condensers to control BWON-affected waste management units.

Flare - §61.357(d)(7)(iv)(F) – Each period in which the pilot flame of a flare is absent.

NOT APPLICABLE. CRRM does not use flares to control BWON-affected waste management units.

Boiler or Process Heater - §61.357(d)(7)(iv)(G) – Each occurrence when there is a change in the location at which the vent stream is introduced into the flame zone of a boiler or process heater as required by §61.3349(a)(2)(i)(C) of this subpart.

NOT APPLICABLE. CRRM does not use a boiler or process heater to control BWON-affected waste management units.

Carbon Adsorber System - §61.357(d)(7)(iv)(H) – Each occurrence when the carbon in a carbon adsorber system that is regenerated directly on site in the control device is not regenerated at the predetermined carbon bed regeneration time.

NOT APPLICABLE. CRRM does not use a carbon adsorber system that regenerate the carbon on site to control BWON-affected waste management units.

Carbon Adsorber System - §61.357(d)(7)(iv)(I) – Each occurrence when the carbon in a carbon adsorber system that is not regenerated directly on site in the control device is not replaced at the predetermined interval specified in §61.354(c) of this subpart.

NOT APPLICABLE. CRRM does not change out carbon beds based on a predetermine interval as described in §61.354(d).

Continuous Parametric Monitoring - §61.357(d)(7)(iv)(J) – Each 3-hour period of operation during which the parameters monitored are outside the range of values specified in §61.349(a)(2)(iv)(C), or any other periods specified by the Administrator for a control device subject to the requirements of §61.349(a)(2)(iv).

NOT APPLICABLE. CRRM does not operate a BWON-affected control device with a continuous parametric monitoring system.

§61.357(d)(7)(v) – For a cover and closed-vent system monitored in accordance with §61.354(g), the owner or operator shall submit a report quarterly to the Administrator that identifies any period in which the pressure in the waste management unit is equal to or greater than atmospheric pressure.

NOT APPLICABLE. CRRM does not use a system for emission control that is maintained at a pressure less than atmospheric that contains openings designed to provide dilution air.

§61.357(e) – An owner or operator electing to comply with the provisions of §61.351 or §61.352 of this subpart shall notify the Administrator of the alternative standard selected in the report required under §61.07 or §61.10 of this part.

NOT APPLICABLE. CRRM did not elect to comply with the provisions of §61.351 or §61.352.

§61.357(f) – An owner or operator who elects to install and operate the control equipment in §61.351 [Alternative Standards for Tanks] of this subpart shall comply with the reporting requirements in 40 CFR §60.115b [Subpart Kb].

NOT APPLICABLE. CRRM did not elect to install and operate the control equipment in §61.351 of this subpart.

§61.357(g) – An owner or operator who elects to install and operate the control equipment in §61.352 [Alternative Standards for Oil-Water Separators] of this subpart shall submit initial and quarterly reports that identify all seal gap measurements, as required in 40 CFR §60.693-2(a) [Subpart QQQ], that are outside the prescribed limits.

NOT APPLICABLE. CRRM did not elect to install and operate the control equipment in §61.352 of this subpart.

Attachment 2
Benzene Waste Operations NESHAP
Quarterly Report

Start Date/Time	End Date/Time
8/7/2016 16:00	8/7/2016 18:00
8/8/2016 9:00	8/8/2016 16:00
8/8/2016 20:00	8/9/2016 0:00
8/9/2016 8:00	8/11/2016 0:00
9/22/2016 6:00	9/22/2016 9:00